

Contracting Community Highlights



In the “Contracting Community Highlights” section of *Army AL&T* Magazine, each feature article is intended to provide in-depth information relative to a contracting organization, mission or process. This issue’s feature article highlights the rapidly evolving area of dining facility contracts and the interpretation of *The Randolph-Sheppard Act* (Vending Facilities for Blind in Federal Buildings). Roger Neds, Chief, General Counsel, Army Contracting Agency (ACA) Northern Region Headquarters, presents an instructive analysis of various issues in this arena using a question-and-answer format.

In addition to the feature article and the regular “DAR Council Corner,” we pass on current news of note from a number of our contracting organizations — including the announcements of a new Director for the ACA Information Technology, E-Commerce and Commercial Contracting Center and a new Director/Principal Assistant Responsible for Contracting for the ACA Southern Region Headquarters.

We appreciate the continued support from the field in providing submissions for publication and we hope you find them informative and interesting. For more information on the topics presented, call or e-mail my office for the pertinent contact information.

Ms. Tina Ballard

Deputy Assistant Secretary of the Army
(Policy and Procurement)

Dining Facility Contracting

Roger Neds

Within the last year, there may not be any area of Army contracting that has undergone as many changes and legal challenges as the area of dining facility contracts and the

interpretation of *The Randolph-Sheppard Act (RSA)*. These changes have included new court rulings; a new provision in the *FY04 National Defense Authorization Act (NDAA)*; a rewriting of *Army Regulation (AR) 210-25, Vendor Facility Program for the Blind on Federal Property*, governing food service contracts; the legal death of the earlier Army policy guidance on *RSA* and the soon-to-be-released replacement guidance; and a DOD policy letter on the interplay between *RSA* and *Javits-Wagner-O'Day (JWOD)* preferences. This last area of contracting has been the source of an outbreak of litigation as both the various State Licensing Agencies (SLA) and *JWOD* offerors seek to protect their preferences and their programs. This article addresses some of these new legal changes. To focus on specific issues, I have structured this article in a question-and-answer format.

Q. Does it matter if the requirement is for full food services, dining facility attendants or both?

A. Based on a series of protest decisions from Fort Lewis, WA, the requirement’s nature can be critical in determining whether it falls under *RSA*. Any requirement involving food preparation falls under *RSA*. However, if dining facility attendant services is the only item being procured and the work does not involve any food handling or preparation (such as peeling potatoes), then *RSA* does not apply. Similarly, garbage or trash removal and clean-up do not constitute food handling. This gives the garrison commander and the servicing Directorate of Contracting some ability to make choices in this area. It is entirely proper to split the food service work from the dining attendant work. The procurement for the former would fall under *RSA*; the latter would not. On the other hand, it is perfectly legal to solicit both areas of work together. In that situation, the *RSA* preference would apply to the whole procurement.

Q. Who may authorize direct negotiations with the SLA?

A. Under the latest *AR 210-25*, the senior on-site official (the garrison commander) may authorize direct negotiations with the SLA. This is a change from past practice where the Principal Assistant Responsible for Contracting had to approve such negotiations. The upcoming ACA guidance states that the ACA prefers that such awards be competed, and that ACA Headquarters must be notified in a timely manner when the contracting officer (KO) learns that the on-site official desires to enter into direct negotiations.

Q. Which preference takes precedence — *RSA* or *JWOD*?

A. This issue has come before two different Federal Courts of Appeal in the past few years. In both cases, the court found that the *RSA* preference controlled. However, in

those acquisitions where a *JWOD* offeror may be able to offer some or all of the services, a KO should also refer to the Oct. 10, 2003, letter issued by the Director, Defense Procurement and Acquisition Policy, Applicability of the *Javits-Wagner-O'Day Program* and the *Randolph-Sheppard Act*. This letter addresses establishing required subcontracts by the SLA to a qualified *JWOD* firm. Likewise, prime contracts require that the contractor subcontract to a qualified *JWOD* firm.

Q. What if a *JWOD* firm is already performing food preparation services?

A. Although the *RSA* preference is the controlling preference, *Section 852, FY04 NDAA*, specifically provides that if a *JWOD* contractor is already performing those services, then all options may be exercised on such a contract and a new procurement does not need to be started until the entire term of the earlier contract has expired. However, when the follow-on acquisition occurs, the *RSA* preference will control.

Q. Can there be an award without discussion?

A. This is a question that raises a lot of confusion. On one hand, the preference to a "blind vendor" is tied to whether the vendor is in the competitive range, which is the trigger for discussions. On the other hand, the *Federal Acquisition Regulation (FAR)* authorizes award without discussion, and this has become a very popular streamlining practice. I believe the forthcoming ACA guidance addresses this issue adequately. With that in mind, I would suggest the following analysis:

- If there is no SLA offer, then an award without discussion to one of the private offerors can be made under the normal *FAR* procedures.
- Awarding to the SLA without discussion is permissible because the SLA is still, in effect, receiving the preference.
- If the SLA has made an offer but would not be in the competitive range if a range were established, then an award without discussion may be made to one of the private offerors. However, before that award is made, the procedures established in *AR 210-25* and in the forthcoming ACA guidance for deciding that an SLA offer is not in the competitive range must be followed.
- If the SLA has made an offer and is or would be within the competitive range, an award on initial proposals to another offeror would be improper. This would, in effect, be a way of circumventing the SLA's preference. As such, it would violate *Section 5b, AR 210-25*, which states that on DOD facilities "the blind will be given a priority award of contracts to operate cafeterias." If there is a sound reason

not to award to an SLA who qualifies for inclusion in the competitive range, the procedure set forth in *AR 210-25, Section 6b(1)(c)* must be followed before an award to a private offeror can be made. In reality, if the SLA is already in the competitive range, I cannot conceive of a situation where we would attempt to award to another entity without at least conducting a round of discussions.

Q: Who decides protests of *RSA* acquisitions?

A. The Department of Education (DOE) is charged by Congress with responsibility for implementing the statute. They have established a mechanism for resolving disputes between the SLA and an agency. The Government Accountability Office (GAO) recently ruled in the Fort Lewis protests that the SLA must use the DOE procedure before they can protest to the GAO. Additionally, in a recent case at Fort Campbell, KY, one judge at the U.S. Court of Federal Claims also ruled that the SLA must initially use this alternate procedure as well. This ruling has been appealed by the SLA. For offerors other than the SLA, normal bid protest procedures apply.

While this article has summarized some of the more important changes in this area, it is still only an overview in an area that is constantly changing. Whenever you have a requirement to contract these services in the near future, speak with your legal advisor early in the process.

News From the Field

ACA-PR Supports Humanitarian Assistance in Laos. MAJ Luis Crespo, a Contingency Contracting Officer assigned to the 45th Corps Support Group at Schofield Barracks, HI, works at the Army Contracting Agency, Pacific Region (ACA-PR) at Fort Shafter, HI. He recently provided all contracting support to Exercises Bailey Leader II and III. These exercises are U.S. Pacific Command (USPACOM)-approved and -funded humanitarian assistance (HA) missions involving the solicitation, award and execution of several U.S. government construction contracts on behalf of USPACOM and the U.S. State Department. All contracts were awarded to local engineering and construction firms to build two schoolhouses in the Province of Savannakhet and a medical surgical center in the Province of Saravan in Laos. The completion of these projects will greatly benefit the Laotian people. Construction was designed to produce

turnkey facilities — functional for the intended purpose on completion, including all basic furniture. These facilities' designs were developed under the direction of the USPACOM's Assistant Chief of Staff for Engineering (ACSENG). Crespo was recently commended by Patricia M. Haslach, the U.S. Ambassador to Laos, for his contracting support during the past 2 years on the HA projects conducted there. These projects will produce some of the finest facilities in Laos and will greatly further U.S. policy goals by facilitating the recovery of American MIA remains and developing stronger relations with the Laotian government.



MAJ Luis Crespo, ACA-PR, and MAJ Robert Husbands, U.S. Army Pacific, ACSENG, conduct the solicitation conference for local engineering and construction firms. (Photo by Chaleunsouk Sapraseuth of the U.S. Embassy in Laos.)

ARCC Seattle Presents Market Research Training. Mary Bonnell, a Contract Specialist with the Army Contracting Agency Army Regional Contracting Center (ARCC), Seattle, WA, Satellite Office, recently trained more than 400 military and civilian employees during the 70th Regional Readiness Command's Full Time Support Conference. Bonnell designed an interactive voyage of discovery — beginning with peanut butter and a used car as the ultimate requirements for the contracting office. Step-by-step, attendees who had little contracting knowledge, but a lot of influence on the procurement process as requirements generators, were guided through the market research process. Bonnell made market research more interesting while teaching regulatory policy and practical how-to advice. Conference feedback was outstanding.

NTC Takes Training to the Warfighter. When deployment schedules are accelerated, and the ACA-Northern Region (NR) National Training Center (NTC) at Fort Irwin, CA, is overcommitted supporting the global war on terrorism, how can the Army train those units prior to a deployment? For the 3rd Armored Cavalry Regiment at Fort Carson, CO,

NTC delivered a mission readiness exercise. To do that, the Directorate of Contracting's military and civilian professionals had an extremely short time to put in place nearly \$2.5 million of training infrastructure. The contracting personnel were formally recognized by the Commanding General, 7th Infantry Division, Fort Carson, and the garrison commander for making the exercise a huge success.

ACA-NR Supports 55th Presidential Inauguration Events.

The pomp and pageantry of the 2005 Presidential Inauguration would not have been as impressive without the Soldiers, Airmen, Marines, Sailors, Coast Guardsmen and civilians who took part performing, marching and guarding. Behind the scenes, there were hundreds of others who planned, coordinated and controlled this highly celebrated national event. MAJ Robert Shelton, Chief of Staff, ACA-NR and the Fort Myer Directorate of Contracting, served on the Joint Task Force-Armed Forces Inaugural Committee special staff and was responsible for ensuring that all military ceremonial support requests by the Presidential Inaugural Committee and the Joint Congressional Committee on Inaugural Ceremonies were properly staffed by legal, comptroller, Army Audit Agency and public affairs professionals. Such support included presidential escorts, military bands, salute guns, marching units, Joint color guards, aerial displays, communications support and overall command and control of various official events. For his efforts, Shelton was recently awarded the Joint Service Achievement Medal.

SMDC Supports Soldiers With the SSET-Light (L). In July 2002, the Space and Missile Defense Battle Lab took an initiative called *Tactical Space Initiative (TACSPACE)* to Millennium Challenge 2002. This initiative was very successful in showing the need for a Space Support Element (SSE) in the battlefield. The SSE is a communication device that provides information directly to warfighters in real time. It is Internet-based and downloaded directly from a satellite. From this initiative, further enhancements and capabilities were incorporated into the hardware and software supporting the SSEs. Through spiral development, new and improved versions of the SSE became a reality as Space Support Element Toolset (SSET). The current system is the SSET-L. This configuration was deployed during *Operations Iraqi and Enduring Freedom*. This design is being modified to allow for a mobile version within a Humvee called the Army Space Support Team Tactical Set. The project is tentatively scheduled to be transitioned to Program Manager, Army Space Project Office.

During SSET development, the Space and Missile Defense Command (SMDC) Contracting Division at the Army

Strategic Command, Colorado Springs, CO, processed, either by individual purchase order or via Streamlined Technology Acquisition Resources for Services Contract Delivery Order, 17 SSET systems totaling approximately \$8.5 million. A major part of this achievement was directly related to the Simplified Acquisition Team's streamlined approach to purchasing the necessary equipment and recognition of the overall mission importance. Items purchased were acquired by commercial practices using *Federal Acquisition Regulation Part 12.603*, which combines the synopsis and the solicitation into one document. Orders were processed on time and either met the delivery date requirements or, as in most cases, deliveries were made ahead of schedule. The SSET-L has achieved high visibility in the Army's progress toward protecting our Soldiers and country during a time of war.

USACCE Supports Battle of the Bulge 60th Anniversary Ceremonies. The Regional Contracting Office-Benelux (RCO-B) of the U.S. Army Contracting Command Europe (USACCE) provided the full spectrum of acquisition services to include planning, procurement and execution of the American portion of the ceremonies for the 60th anniversary of the Battle of the Bulge. The project involved discussions in three languages and detailed coordination with representatives of the Duchy of Luxembourg and Kingdom of Belgium. RCO-B awarded contracts for ceremonial facilities, a tactical operations center, facilities for distinguished visitors and honored veterans, transportation, latrines and a life-support area for 200 Soldiers.

The Secretary of the Air Force and U.S. ambassadors to Belgium and Luxembourg attended the ceremonies along with numerous other distinguished visitors. Both ambassadors

expressed their gratitude to Task Force Commander MG David Zabecki for the professional, responsive support provided. Zabecki noted the extraordinary support that the Task Force received from the regional contracting office. These efforts sometimes went beyond acquisition support. When a Soldier went down at Bastogne with possible hypothermia, Rene Peeters of RCO-B responded immediately by calling for a local ambulance and stationed himself outside in the bitter cold to intercept and guide the ambulance driver. Such dedication and service is typical of Peeters, who was recognized for these qualities with USACCE's Head of Contracting Award for Civilian Professional of the Year in 2003.

Zabecki has recommended that Peeters be awarded the Achievement Medal for Civilian Service for his efforts associated with this mission.

AMCOM Acquisition Center Maintenance and Overhaul (M&O) Contracting Team. During FY04, the Aviation and Missile Command's (AMCOM's) Acquisition Center M&O Contracting Team obligated \$370.7 million, encompassing more than 182 individual contracting actions, to support the Integrated Material Management Center in its M&O requirements. These requirements included M&O contracting support for Apache, Black Hawk, Kiowa, Cargo, Aviation Sets and Kits as well as all associated engine requirements for each of the aviation platforms, which involved four customers. These awards represented long-term (3- to 5-year) indefinite delivery, indefinite quantity contracts. Because of the complex nature of the M&O requirements and the competitive nature of the acquisitions, team members performed more than 25 source selection evaluations to ensure that the government obtained the best value for each of these actions. This team of contracting professionals exhibited tremendous dedication to Soldiers and to supporting the command's mission.

ACA-SR Participates in Industry Partner Conference. On Jan. 26, 2005, acquisition professionals from the Army Contracting Agency-Southern Region (ACA-SR) participated in a conference sponsored by Contract Services Association of America (CSA), the ACA's industry partner. The theme for the Atlanta, GA, event was "Opportunities and Initiatives in Government Services Contracting." Toni Gaines, Acting Director, ACA-SR, welcomed CSA to the Southern Region. Beverly Thomas, Chief, Contract Operations Division, led a panel discussion on SR contracting opportunities and initiatives. Other panel participants were: Timothy Tweed, Director, SR Contracting Center; Steve Sullivan, Liaison



Rene Peeters, RCO-B Procuring Contracting Officer, on the ground in Luxembourg providing contracting support for the Battle of the Bulge 60th Anniversary ceremonies. (USACCE Photo.)



ACA conference participants (standing, from left) Lenneia Jennings, Timothy Tweed, Steve Sullivan and Sharon Wilbon; (seated, from left) Beverly Thomas, Toni Gaines and Vicki Vandermier. (Photo by Steven Hunnicutt, ACA-SR.)

Networking Officer, Installation Management Agency Southeast Region; Lenneia Jennings, Chief, Innovations and Efficiencies Branch; and Vicki Vandermier, Procurement Analyst. The panel discussed the ACA-SR mission, function, objectives and business rules, and the future migration of selected acquisitions to the East and West Contracting Centers. The panel also discussed ACA-SR customers and current contracting opportunities, and the liaison mission to the Installation Management Agency, Southeast Region Office. Melissa Rider, Deputy Director, ACA, was the luncheon keynote speaker.

SMDC Interns Observe MRC SOW in Action. The U.S. Army Space and Missile Defense Command (SMDC) Contracting and Acquisition Management interns recently toured the Missile Recycling Center (MRC) at the Anniston Defense Munitions Center (ADMC) located at the Anniston Army Depot (ANAD), Anniston, AL. Tour guides were Gordon L. Williamson, ADCM Director; Dr. William S. Melvin, U.S. Army Aviation and Missile Research, Development and Engineering Center; and Dr. Earl Hughes, Amtec Corp. The tour provided firsthand exposure to missile recycling technologies that protect the environment, provide jobs to the local region and save taxpayer money by avoiding costly environmental remediation. The MRC does not handle chemical, nuclear or biological products and doesn't have a relationship with the Anniston Chemical Agent Disposal Facility, which is also located at ANAD. During the tour, ADCM MRC employees explained each processing station's work to SMDC interns. The SMDC interns found the site visit interesting and rewarding, and considered it an excellent opportunity to see how the SMDC contract scope of work (SOW) for the MRC is executed.

Congratulations to:

Michelle Currier – HQ, ACA. Michelle Currier, Headquarters, ACA, was recognized as one of the top 25 businesswomen of Hampton Roads, VA, with the Women in Business Achievement Award. Recognized for her continued contributions to the contracting profession, Currier is past National President of the National Contract Management Association and now serves as the National Vice President and Secretary.

Linda Van Collie – ACA-ITEC4. On Jan. 7, 2005, Linda Van Collie, Information Technology, E-Commerce and Commercial Contracting Center (ITEC4) Contracting Officer, was presented the Outstanding Program Manager of 2004 Award from the Defense Information Systems Agency. Van Collie was recognized for her accomplishments in supporting the Direct Communications Link program, commonly known as the "Russian Hot Line." Van Collie has played an important role as the program grew from the original hot line to today's multinational communications program that is critical to world security.

Toni Gaines – ACA-SR. Toni M. Gaines, Acting Director, ACA-SR, was featured as a *Javits-Wagner-O'Day (JWOD)* Champion in the March 2005 issue of NISH's *Workplace Magazine*. A *JWOD* Champion is a federal employee — a "point of influence," primarily in acquisition — who fully believes in the *JWOD* program's mission and is doing everything in his or her sphere of responsibility to provide employment opportunities for people with disabilities. Gaines' efforts have resulted in securing a tremendous volume and variety of *JWOD* projects, including administrative services, grounds maintenance, janitorial and food service contracts. In fact, more than 5,400 full-time equivalent jobs have been provided to people with disabilities every year, in part, because of Gaines' support.

Matthew J. Franzen and Donald E. Alexander – TACOM AC. Franzen and Alexander, of the Tank-automotive and Armaments Command (TACOM) Acquisition Center (AC) in Warren, MI, each received an Achievement Medal for Civilian Service for exceptional performance of duty Oct. 1-29, 2004, in support of the First U.S. Army. Prior to this period, the First U.S. Army did not possess a continuous, mobile and secure communications capability. Franzen and Alexander were part of a cross-functional team of TACOM Integrated Logistics Support Center and G-8 associates who were able to provide two command and control vehicles within a matter of days to the First Army. Franzen and Alexander were cited for their thorough technical expertise, extraordinary efforts and keen sense of urgency in filling this

critical mission void. A portion of the personal message from Doug Ricker, Deputy Chief of Staff, G-8, First U.S. Army, follows: "I had no idea how to acquire these command and control vehicles. I had exhausted every local command source with no success. Someone suggested that I address the issue to TACOM. Within a matter of days, the vehicles were parked in front of the First Army headquarters. To those within your headquarters, this action may not appear to be significant. Most likely, it was probably nothing more than routine to you. However, I can tell you that it is the most professional and thorough action I have seen in my 30-plus years of service to the Army. Please note that the previous sentence does not state 'one of the most professional actions' but the singular 'the most professional action.' I am very pleased to know that we have such an outstanding corps of professionals such as you and to recognize you with these awards."

For additional citations, please see the May-June 2005 Web Edition of *Army AL&T* Magazine at <http://asc.army.mil/pubs/alt/default.cfm>.

ACA-SR Announces New Director and PARC



Carol Lowman, new Director and PARC for ACA-SR.

The Army Contracting Agency (ACA) is pleased to announce the selection of Carol Lowman as the new Director and Principal Assistant Responsible for Contracting (PARC) for the Southern Region (SR) Headquarters, Fort McPherson, GA. Lowman began her acquisition career at Fort Ritchie, MD, and then moved on to Fort Gillem, GA. She

has served at Fort McPherson since 1994 with the Army Atlanta Contracting Center, Forces Command Contracting Division, and, most recently, as the ACA-SR Business Systems Division Chief. She was a vital member of the team that created and implemented the ACA and is currently participating on the Deputy Assistant Secretary of the Army for Policy and Procurement Contracting Study Team that is recommending how ACA will transform for the future. Lowman has a master of public administration degree and expects to complete her Ph.D. from the University of Georgia this year.

ACA-ITEC4 Announces Senior Executive Service Selection

Bryon J. Young has been officially appointed Director for the U.S. Army Contracting Agency (ACA) Information Technology, E-Commerce and Commercial Contracting Center (ITEC4) after several months as Acting Director. In his previous assignment, Young served as ACA Deputy Director. Young retired from the U.S. Army in January 2003 after 27 years of service.

Sandra O. Sieber, ACA Director, hosted a promotion ceremony for Young Dec. 16, 2004, to formally recognize his selection as a member of the Senior Executive Service (SES). During the ceremony, Sieber and Young's wife, Mary, administered the Oath of Office and presented him with an SES certificate.



Sandra O. Sieber, ACA Director, presents the SES selection certificate to Bryon J. Young during his promotion ceremony. (Photo by DA staff photographer.)

As the ITEC4 Director, Young is responsible for executing ACA's worldwide mission for the procurement of all common-use information technology (IT) hardware, software and services. This includes direct procurement support for the Army's Network Enterprise Command, the Program Executive Office Enterprise Information Systems and the Army Chief Information Officer/G-6. Additionally, ITEC4 supports designated key Army and Joint IT and related programs.

Young graduated from the University of Delaware and earned an M.S. in business administration from Boston University. An Army Acquisition Corps member, he is Level III certified in contracting and program management. His professional education and training includes the Defense Systems Management College Program Manager's and Executive Program Manager's Courses, the U.S. Army War College and the U.S. Army Command and General Staff College.

Competitive Professional Development Opportunities

The Office of the Assistant Secretary of the Army for Acquisition, Logistics and Technology is offering 1-year developmental assignments to all DA employees at the GS-12 level (or Acquisition Demonstration broadband equivalent) in the Contracting and Acquisition Career Program (CP-14). The Contracting Career Program Office funds travel and temporary duty costs. For details, see the June 29, 2004, memorandum *FY2005 Competitive Professional Development (CPD) Announcement for the Contracting and Acquisition Career Program (CP-14)*.

The U.S. Army Acquisition Support Center at Fort Belvoir, VA, has additional information about this opportunity. Contact Sally Garcia at (703) 805-1247, DSN 655-1247 or e-mail Sally.Garcia@us.army.mil. For more information, go to <http://asc.army.mil/programs/cp/opportunities.cfm>.

The DAR Council Corner

Business Partner Network

As part of the Integrated Acquisition Environment (IAE) e-Government initiative, the Business Partner Network (BPN) established a single source for vendor data for the federal government and companies seeking to do business with it. The BPN — located at <http://www.bpn.gov> — is a Web-enabled capability for identifying federal and industry trading partners. The BPN creates a one-stop source for Central Contractor Registration (CCR), Federal Agency Registration (FedReg), Online Representations and Certifications Application (ORCA), Past Performance Information Retrieval System (PPIRS), Excluded Parties List System (EPLS) and Equal Employment Opportunity (EEO) Pre-award Clearance.

BPN Web site features include:

Under the CCR link, the Marketing Partner Identification Number (MPIN), Government Business point of contact (POC) and the Alternate Government Business POC are now mandatory for all CCR registrations. The MPIN is a personal code that allows access to other government applications such as the PPIRS, Federal Business Opportunities

System, Federal Technical Data Solutions, ORCA and Grants.govSM.

FedReg collects information about federal government offices that act as trading partners, using BPN numbers as unique identifiers for individual federal locations. The FedReg sends this data to the exchange system so that information about each participant is included with each transaction.

ORCA is an e-Government initiative that was designed by the IAE to replace the paper-based representations and certifications process. In conjunction with the required registration in the CCR database, prospective contractors need to complete electronic annual representations and certifications at <http://orca.bpn.gov>.

PPIRS is a Web-enabled, governmentwide application that provides timely and pertinent past performance information to the federal acquisition community for use in making source selection decisions. PPIRS assists federal acquisition officials in making source selections by serving as the single source for contractor past performance data.

EPLS integrates the Department of Treasury's Office of Foreign Assets Control (OFAC) list and the Department of Commerce's Bureau of Industry and Security (BIS) lists into one database. Users will no longer need to check separate lists within EPLS for excluded parties. These lists do not replace the lists available at the OFAC and BIS Web sites.

EEO Pre-award Clearance provides the national pre-award registry information concerning federal contractors that have been reviewed by the Office of Federal Contract Compliance Programs (OFCCP). These federal contractors have been found to be in compliance with the EEO regulations that the OFCCP enforces. The information contained in this registry is for the 2-year period preceding the current date and facilities reviewed more than 2 years ago are removed as new ones are added. This system does not provide information on parent organizations or other facility locations that have not been reviewed within the past 2 years. If a given facility is found to be in compliance, this does not imply that sibling facilities under the same parent organization received the same favorable finding. This registry provides a search engine and allows you to download the entire registry.

This information is provided by the DAR Council Army Policy Member Barbara Binney.